

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

ORIGINAL

In re Applications of  
NORMANDY BROADCASTING CORP.

For Renewal of License of  
Station WYLR(FM) (95.9 MHz)  
Glens Falls, New York

and

LAWRENCE N. BRANDT

For a Construction Permit for  
a New FM Station on 95.9 MHz  
at Glens Falls, New York

To: Administrative Law Judge  
Richard L. Sippel

) MM DOCKET NO. 92-6

) File No. BRH-910129U

) File No. BPH-910430MB

ORIGINAL  
FILE

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MAR 30 1992

Federal Communications Commission  
Office of the Secretary

**SUPPLEMENT TO PETITION TO MODIFY AND ENLARGE ISSUES**

Pursuant to the Order FCC92M-381 released in this proceeding on March 26, 1992, Lawrence N. Brandt, by his attorneys, hereby supplements the Petition to Modify and Enlarge Issues ("Petition") against Normandy Broadcasting Company ("Normandy") that he filed in this proceeding on February 24, 1992 to include the following materials attached hereto:

Exhibit A: A copy of the Declaration of Donald W. Heckman ("Heckman Declaration") that was filed in MM Docket 90-181 in support of both the June 28, 1990 Opposition of Bradmark Broadcasting Company ("Bradmark") to the "Threshold Showing Concerning Broadcast Record" that Normandy had filed in that proceeding and Bradmark's separate June 28, 1990 Petition to Enlarge Issues against

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Normandy. Included as part of the Heckman Declaration as Appendix C is an Affidavit of Sharrae J. Frasier ("Fraisier Affidavit") describing how the issues programs lists for radio Stations WWSC(AM) and WYLR(FM) for the period from January 1, 1987 to June 1990 which were attached as Appendix B to the Heckman Declaration were obtained.<sup>1/</sup>

Exhibit B: A Declaration of Normandy's President, Christopher P. Lynch ("Lynch Declaration"), which was filed as Annex 1 to an Opposition to Petition to Enlarge Issues that Normandy filed in MM Docket 90-181 on or about July 13, 1990 wherein Mr. Lynch did not dispute Bradmark's claim that the issues/programs list attached as Appendix B to the Heckman Declaration constituted all of the issues/programs lists for WWSC/WYLR for the period in question, i.e., January, 1987 to June, 1990, but argued that the said issues/programs lists "contain representative


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<sup>1/</sup> As stated by Brandt's undersigned counsel on the record of the pre-hearing conference in this proceeding, and as reflected in the Petition itself, the issues/programs lists for WWSC/WYLR submitted as Exhibit A to the Petition were the ones submitted with Bradmark's Petition to Enlarge Issues against Normandy in MM Docket 90-181. As Appendix B to the Heckman Declaration and Exhibit A to the Petition are identical, the issues/programs lists which were attached to the Heckman Declaration are not being resubmitted at this time.

programs" and submitted a supplemental "list of broadcasts which WYLR has aired."

The Heckman Declaration and the Frasier Affidavit which are part of the record in MM Docket 90-181 provide the requisite substantiation that the issues/programs lists attached to the Petition constitute the only issues/programs lists for WYLR that Normandy had prepared and placed in that station's public file as of June, 1990 for the period from January, 1987 to June, 1990. The Lynch Declaration which is also a part of the record in MM Docket 90-181 provides further corroboration for this fact. The issues sought in the Petition relate solely to whether Normandy's representation in WYLR's license renewal application that it had placed the required documentation concerning the issues that WYLR had dealt with in its programming in the station's public file at the appropriate times. The materials attached hereto establish a prima facie case that during the period from January, 1987 to June, 1990, Normandy did not place the required documentation in WYLR's the issues/programs at the appropriate times and that Normandy's representation in WYLR's renewal application that it had done so was false.

Respectfully submitted,



David Tillotson

Arent, Fox, Kintner, Plotkin  
& Kahn

1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 857-6027

Date: March 30, 1992

## **EXHIBIT A**

## DECLARATION OF DONALD W. HECKMAN

Donald W. Heckman states under penalty of perjury as follows:

1. I am President of Bradmark Broadcasting Company ("Bradmark"), licensee of station WENU(FM), Hudson Falls, NY, and Station WSTL(AM), South Glens Falls, NY and I am General Manager of both of those stations. Bradmark is an applicant for a new FM station in Queensbury, NY (MM Docket 90-181).

2. Prior to the acquisition of WENU and WSTL in the Spring of 1986, I was employed by radio stations WQLR(FM) and WQSN(AM), Kalamazoo, Michigan from 1981 to 1986, and employed at radio stations WSBA(FM) and WSBA(AM), York, Pennsylvania from 1966 to 1981.

3. I have reviewed the claims made by Normandy Broadcasting Company ("Normandy") in the Threshold Showing of Meritorious ("Threshold Showing") Broadcasting Record that Normandy filed in MM Docket 90-181, wherein Normandy attempts to establish that the public service programming that it has broadcast over Stations WWSC(AM) and WYLR(FM), Glens Falls, NY (the "Stations") reflects "'unusual' attention to the public's needs and interests," that Normandy "is among the few Commission licensees which takes the 'public interest' component of their license seriously," and that the Stations "have exceeded average performance" in the area of public service programming under Normandy and its sole stockholder, Christopher Lynch. Assuming that the programming claims contained in the Threshold Showing were all true, they would not establish that the programming of the Stations has been "unusual" in its attention to public interests and issues, or that the public service performance of the Stations has been above average for the Glens Falls market, or for markets of similar size because:

(a) Stations operating in markets similar to the Glens Falls market, especially AM stations, typically broadcast the quantities of non-entertainment programming that Normandy claims have been broadcast over the Stations.

(b) Bradmark's stations, which operate in the same market as the Stations, regularly broadcast the following weekly amounts of news, public affairs and other public service programming (primarily public service announcements):

<u>WSTL</u>	<u>Hours/Minutes</u>	<u>% of Brdcst Wk</u>
News	18 hrs., 12 mins.	10.8
P A	2 hrs.	1.2
PSA	3 hrs., 16 mins.	1.9
TOTAL	23 hrs., 28 mins	14.0

<u>WENU</u>	<u>Hours/Minutes</u>	<u>% of Brdcst Wk</u>
News	18 hrs., 12 mins.	10.8
P A	2 hrs.	1.2
PSA	2 hrs., 20 mins.	1.4
TOTAL	22 hrs., 32 mins.	13.4

(c) Like Normandy, Bradmark has received numerous citations and awards for its public service programming. A representative listing of such awards is attached as Appendix A hereto.

(d) Like Normandy, Bradmark broadcasts bulletins of severe weather conditions over both of its stations. In order to provide a more accurate and up-to-date weather information, Bradmark subscribes to Accu-weather, a nationally known and credible weather forecasting service that requires substantial fees to that company in order to provide this service to their listeners.

4. As a competitor of Normandy in the Glens Falls market, I am familiar with the way in which Normandy has programmed the Stations. Based upon my familiarity with the programming of these stations, which I confirmed by monitoring WYLR during the past several days, and by reviewing the issues/programs lists for the Stations for the period from January, 1987 to the present, which are attached as Appendix B hereto, which lists were obtained for me by Sherrae J. Frasier in the manner described in the declaration attached as Appendix C hereto, the following claims in Normandy's Threshold Showing are not true:

(a) The Stations do not both present a "Mid day" talk show five days a week. The talk show referred to in the Threshold Showing airs only on WWSC(AM).

(b) Both Stations do not carry the daily syndicated Tom Snyder talk show. This show only airs on WWSC.

(c) The Stations do not both devote "about twenty percent" (20%) of their weekly air times to "news, public affairs and other non-entertainment programing." Station WYLR operates as a typical entertainment radio station, with a minimum of breaks for news and public service programming. While I did not monitor a full week of programming, based upon my monitoring of WYLR over the last several days, which included both weekend and weekday programming, it is inconceivable that the station is currently devoting anywhere near 20% of its broadcast week to non-entertainment programming.

  
Donald Heckman

Date: June 26, 1990

## **APPENDIX A**



A RANDOM SAMPLING OF THE AWARDS AND CITATIONS WON BY WENU FM/WSTL AM

WARREN/WASHINGTON COUNTIES MENTAL HEALTH AWARD, for outstanding services and coverage.

GLENS FALLS YMCA distinguished award for coverage and participation in the Adirondack Open, a benefit for underprivileged children.

OUTSTANDING SERVICE AWARD from the Center for the Developmentally Disabled/Prospect School....raised \$22,500.

OUTSTANDING COVERAGE AWARD for Jail and Bail Contest where we raised over \$3000 for the March of Dimes.

APPRECIATION AWARD from the family of local 12 year old for raising \$5000 through a Country Jamboree for a kidney transplant.

PARTNERSHIP AWARD from the Lower Adirondack Regional Arts Council for the Radio Station of The Festival Coverage.

AP SPECIAL CITATION AWARD for outstanding on the scene coverage of a four county state police drug raid.

AP SPECIAL CITATION AWARD for outstanding coverage of a collision and crash of two small aircraft at local Warren County Airport.

MEDIA AWARD for outstanding commitment to the March of Dimes, NE New York Chapter.

1986-87-88-89-90 OUTSTANDING ACHIEVEMENT AWARD from Caritas (Glens Falls Hospice) for Radiothons that produced over \$60,000.

DISTINGUISHED AWARD from Walk America/March of Dimes, for raising over \$31,000.

AMERICAN LEGION CERTIFICATE OF APPRECIATION for outstanding work done by WENU/WSTL for awareness of POW's and MIA's.

COUNTRY CARES AWARD, for outstanding coverage and fund raising for ST.Judes Hospital.

1986-87-88-89-90 RECOGNITION AWARD from the Lake George Rotary for radiothons that helped raise over \$25,000 for foreign student exchange program.

ACHIEVEMENT AWARD for outstanding coverage and The Official Station of the Adirondack Balloon Festival.

## **APPENDIX B**

## APPENDIX C

AFFIDAVIT

I, SHERRAE J. FRASIER, being duly sworn deposes and says that:

1. On Friday, June 22, 1990, I went to Normandy Broadcasting (WWSC-AM, WYLR-FM) located at 217 Dix Avenue, Glens Falls, New York and requested copies of their Issues and Programming Reports from 1987 to the present.

2. I was shown a file marked "Public Issues" and allowed to view the contents. The employee, Jessica Bennett, removed the reports beginning in 1987 and took them to photocopy.

3. She returned, handed me the reports and stated the 1990 reports were in another file. I was requested to return that afternoon to pick up copies of the 1990 reports, which I did.

4. Although I did not see the photocopies being made, I requested all the reports which were on file for the years 1987 to the present and believe I received the same.

Sherrae J. Frasier  
SHERRAE J. FRASIER

Sworn to before me  
this 26<sup>th</sup> day of June, 1990.

Bruce G. Carr  
Notary Public

**BRUCE G. CARR**  
Notary Public - State of New York  
Warren County - #4808918  
Commission Expires October 31, 1990

## **EXHIBIT B**

## Annex 1

DECLARATION

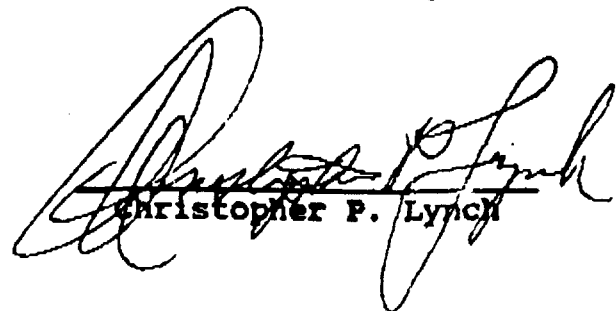
1. I am President of Normandy Broadcasting Corporation ("Normandy"), which is the licensee of Stations WWSC and WYLR(FM), Glens Falls, New York.

2. The Stations' quarterly lists of issues, some of which were attached to Bradmark Broadcasting Company's ("Bradmark's") Opposition To Threshold Showing Concerning Broadcast Record, do not purport to describe each public service activity broadcast over either Station. Rather, the lists contain representative programs, many of which are broadcast only on WWSC, which, is the dominant station with the larger listener base.

3. To assist the Presiding Judge in ruling on Bradmark's request to add an issue against Normandy, I have prepared the attached list of broadcasts which WYLR has aired. Even this list contains only a representative sample of that Station's public service programming.

4. Under penalty of perjury, I declare the foregoing to be true and correct.

Dated: July 13, 1990



Christopher P. Lynch

(1984)

AUGUST: THE MOSCOW MUSIC PEACE FESTIVAL

WYLR SIMULCAST THIS CONCERT EVENT WITH HARRON CABLE ON AUGUST 13th. PROCEEDS OF PLEDGES MADE DURING THE CONCERT WENT TO "THE MAKE A DIFFERENCE FOUNDATION"...A NON-PROFIT ORGANIZATION THAT FIGHTS DRUG AND ALCOHOL ABUSE.

OCTOBER: HOMETOWN USA ADOPTS A TOWN

WYLR PROVIDED PROMOTIONAL SUPPORT FOR THIS LOCAL PROGRAM IN THE FORM OF PSA'S, AND LIVE REMOTE BROADCASTS FROM BENEFIT FUNDRAISERS IN THE AREA. IN ADDITION, WYLR WAS A DROP-OFF POINT FOR FOOD AND CLOTHING TO BE SHIPPED TO MANNING, SOUTH CAROLINA: A COMMUNITY RAVAGED BY HURRICANE HUGO.

OCTOBER-DECEMBER: THE HOLIDAY HOPE CHEST

WYLR AGAIN COORDINATED THE HOLIDAY HOPE CHEST FOR OPERATION SANTA CLAUS. WE SERVE AS THE RECRUITMENT COORDINATOR FOR LOCAL SCHOOL PARTICIPATION, AND AS A PROMOTIONAL VEHICLE FOR EACH OF THE SCHOOL'S FUNDRAISING EVENTS: WHICH BENEFIT UNDERPRIVELEGED CHILDREN IN OUR REGION DURING THE CHRISTMAS SEASON. WYLR'S COMMITMENT TO THIS PROGRAM INCLUDED: A 12 WEEK PROMOTIONAL CAMPAIGN...WYLR MANAGEMENT MAKING PRESENTATIONS OF PROGRAM TO MEMBERS OF ALL LOCAL SCHOOL DISTRICTS...AND LIVE BROADCASTS FROM FUNDRAISING EVENTS. THIS PROGRAM CULMIATED ON DECEMBER 1st, WITH \$13,437.47 RAISED FOR OPERATION SANTA CLAUS.

NOVEMBER-DECEMBER: THE VOLLEYBALL CLASSIC FOR EASTER SEALS

WYLR SERVED AS THE RECRUITMENT COORDINATOR FOR PARTICPANTS IN THE VOLLEYBALL CLASSIC. OUR PROGRAM INCLUDED 2 MONTHS OF PROMOTIONAL ANNOUNCEMENTS AND PSA'S TO RECRUIT TEAMS FOR THIS BENEFIT. ~~OVER \$10,000~~ WAS RAISED DURING THE VOLLEYBALL MARATHON: JANUARY 6th & 7th 1990 AT ADIRONDACK COMMUNITY COLLEGE. 42 TEAMS

NOVEMBER: THE FT EDWARD CHRISTMAS DECORATION FUND DRIVE

WYLR AIRED A SERIES OF PSA'S AND PROMOTIONAL ANNOUNCEMENTS FOR UPCOMING FUNDRAISING EVENTS FOR THE VILLAGE OF FORT EDWARD'S CHRISTMAS DECORATION DRIVE ~~OCTOBER~~ 2nd thru 26th. ON ~~OCTOBER~~ 6th <sup>NOVEMBER 26th</sup> A FOUR-HOUR REMOTE BROADCAST WAS HELD FROM THE VILLAGE'S STREET DANCE FUNDRAISER.

0,843.89

=PUBLIC ISSUES AND PROGRAMS CONTINUED

1989

APRIL:    JOB DISCOVERY 89

FIFTY FIRMS OFFERED SEMINARS AND JOB OPPORUNITIES TO OVER 1900 ATTENDEES, APRIL 25th, 1989 AT ADIRONDACK COMMUNITY COLLEGE. WYLR AIRED A 3 WEEK PSA CAMPAIGN AND AN 8 HOUR REMOTE DURING THE EVENT. CO-SPONSORED BY WYLR & WWSC.

APRIL:    GUEST DJ'S

DURING THIS FOUR WEEK CAMPAIGN, WYLR WELCOMED OUTSTANDING LOCAL HIGH SCHOOL JUNIORS AND SENIORS INTO THE STUDIOS FOR A ONE-HOUR "GUEST DJ" SHIFT. PARTICIPANTS INCLUDED MEMBERS OF LOCAL SADD (STUDENTS AGAINST DRUNK DRIVING) CHAPTERS, WHO DISCUSSED THE SADD EVENTS TAKING PLACE AT THEIR SCHOOL. THIS EVENT WAS PART OF THE "SCHOLAR APPRECIATION WEEK" PROGRAM, SPONSORED IN PART BY THE ADIRONDACK REGIONAL CHAMBER OF COMMERCE.

MAY-JUNE:    THE SOFTBALL MARATHON FOR EASTER SEALS

WYLR SERVED AS RECRUITMENT COORDINATOR FOR THIS EVENT, AND AIRED A 6 WEEK PSA CAMPAIGN TO RECRUIT TEAMS TO PLAY IN THE MARATHON. 25 TEAMS RAISED OVER \$5,000 FOR THE NEW YORK STATE EASTER SEALS SOCIETY.

JUNE:    THE NON-ALCOHOLIC GRADUATION PARTY

THIS PROGRAM WAS AIRED TO GIVE GRADUATES AN ALTERNATIVE TO THE USUAL GRADUATION PARTY ATMOSPHERE, WHICH OFTEN INCLUDES ALCOHOL. WYLR AIRED A 3 WEEK SERIES OF PSA'S IN CONJUNCTION WITH NAB'S "OPERATION PROM/GRADUATION" CAMPAIGN, AND HELD "THE NON-ALCOHOLIC GRADUATION PARTY": JUNE 16th AT NITELIFE, A NON-ALCOHOLIC DANCE CLUB IN LAKE GEORGE. FREE ADMISSION, COMPLIMENTARY FOOD AND SOFT DRINKS WERE PROVIDED TO GRADUATING HIGH SCHOOL SENIORS. A 3 HOUR REMOTE BROADCAST ADDRESSING THE DANGERS OF DRINKING AND DRIVING WAS ALSO HELD DURING THE EVENT.

JULY-AUGUST:    THE ADIRONDACK 100

AN EIGHT WEEK PROMOTIONAL CAMPAIGN COORDINATED THE RECURITMENT OF RIDERS TO PARTICPATE IN THIS EVENT, WHICH RAISED MONEY FOR MULTIPLE SCLEROSIS. 165 CYCLISTS RAISED OVER \$12,000 FOR M.S.



=PUBLIC ISSUES AND PROGRAMS

1988:

OCTOBER-DECEMBER: THE HOLIDAY HOPE CHEST

PROMOTIONAL CAMPAIGN TO RAISE FUNDS FOR THE UNDERPRIVLEDGED CHILDREN IN THE COMMUNITY DURING THE CHRISTMAS SEASON, WITH "OPERATION SANTA CLAUS", AND LOCAL HIGH SCHOOLS. Y96FM WAS THE SOLE SPONSOR OF THIS EVENT, AND COORDINATED THE FUND RAISING DRIVE. PROMOS AND PSA'S RAN 10/1-11/30/88. TOTAL RAISED: \$9347.90

OCTOBER 88-JANUARY 89: THE VOLLEYBALL MARATHON FOR EASTER SEALS

A 3 MONTH PROMOTIONAL CAMPAIGN TO RECRUIT PARTICIPANTS FOR THE VOLLEYBALL MARATHON, JANUARY 7 & 8 1989 AT ADIRONDACK COMMUNITY COLLEGE. TOTAL RAISED: \$9,648.07

NOVEMBER 88: THE THANKSGIVING TURKEY GIVEAWAY

AS PART OF AN ON-AIR PROMOTION WYLR DONATED 13 TURKEYS TO THE SALVATION ARMY OF GLENS FALLS, WHO DISTRIBUTED THE TURKEYS TO LOCAL FOOD BASKET PROGRAMS FOR THE THANKSGIVING HOLIDAY.

DECEMBER 88: THE ANGELA WILLIAMS BENEFIT

A 2 WEEK PROMOTIONAL CAMPAIGN, AND 3 HOUR REMOTE BROADCAST WAS AIRED FOR A BENEFIT CONCERT AT THE GROUND ROUND IN THE AVIATION MALL. MONEY RAISED AT THIS BENEFIT THRU SPECIAL WINE AND BEER CONCESSIONS WENT TO ANGELA WILLIAMS: A 10 YEAR OLD GLENS FALLS NATIVE WHO WAS UNDERGOING TREATMENTS FOR CURVITURE OF THE SPINE.

DECEMBER 88: THE MILLER CHRISTMAS WREATHE PROGRAM FOR CP

A THREE WEEK PROMOTIONAL AND PSA CAMPAIGN ALERTED LISTENERS TO THE PROGRAM. MILLER BEER, AND IT'S LOCAL DISTRIBUTOR MADE WREATHES AVAILABLE FOR PURCHASE. MONEY RAISED FROM THE SALE OF THESE WREATHES WAS DIVIDED BETWEEN THE NATIONAL CEBREBRAL PALSY FUND, AND OUR LOCAL CENTER FOR THE DEVELOPMENTALLY DISABLED IN GLENS FALLS.

AUGUST 1986...THE SOFTBALL MARATHON FOR EASTER SEALS.

WYLR HAS BEEN THE SOLE MEDIA OUTLET AND CO=SPONSOR FOR THIS ANNUAL EVENT SINCE 1982. OVER \$4,700 WAS RAISED IN THIS YEAR'S EVENT. AS WELL AS FOUR WEEKS OF PSAs, WYLR FIELDLED A TEAM IN THE EVENT.

MARCH 1987...THE VOLLEYBALL MARATHON FOR EASTER SEALS.

WYLR HAS BEEN THE SOLE MEDIA OUTLET AND CO=SPONSOR OF THIS ANNUAL EVENT SINCE 1985. OVER \$6000 WAS RAISED IN THIS YEAR'S EVENT. AS WELL AS FOUR WEEKS OF PSAs AND PROMOS, WYLR FIELDLED A TEAM IN THE EVENT.

JULY 1987...THE SOFTBALL MARATHON FOR EASTER SEALS.

WYLR HAS BEEN THE SOLE MEDIA OUTLET AND CO=SPONSOR OF THIS ANNUAL EVENT SINCE 1982. OVER \$5,000 WAS RAISED IN THIS YEAR'S EVENT. AS WELL AS FOUR WEEKS OF PSAs AND PROMOS, WYLR FIELDLED A TEAM IN THE EVENT.

MAY 1988...THE VOLLYBALL MARATHON FOR EASTER SEALS.

WYLR HAS BEEN THE SOLE MEDIA OUTLET AND CO=SPONSOR OF THIS ANNUAL EVENT SINCE 1985. OVER \$6000 WAS RAISED IN THIS YEAR'S EVENT. AS WELL AS FOUR WEEKS OF PSAs AND PROMOS, WYLR FIELDLED A TEAM IN THE EVENT.

JUNE 1988...THE EASTER SEALS "WING DING"!

WYLR WAS THE SOLE MEDIA OUTLET AND CO=SPONSOR OF THIS EVENT. AREA RESTURANTS WERE RECRUITED TO CHALLENGE OTHER RESTURANTS TO SEE WHO HAD THE BEST CHICKEN WINGS. OVER \$1000 WAS RAISED. WYLR BROADCAST FROM THE EVENT.

JULY = AUGUST 1987...THE ADIRONDACK CENTURY BIKE RUN FOR MULTIPLE SCLEROSIS.

1987 WAS THE INITIAL YEAR OF THE "ADIRONDACK CENTURY". WYLR SPENT SEVEN WEEK PROMOTING THE EVENT WITH PSAs AND GUEST APPEARANCES BY MEMBERS OF THE LOCAL MS CHAPTER (ALBANY) AND THE "ADIRONDACK SPOKES" BICYCLE CLUB. A FREE REMOTE BROADCAST WAS DONE ON THE DAY OF THE EVENT. OVER \$15,845 WAS RAISED. A LETTER FROM PAUL BARTOSZEWICZ IS AVAILABLE FOR INSPECTION.

JULY = AUGUST 1988...THE ADIRONDACK CENTURY BIKE RUN FOR MULTIPLE SCLEROSIS.

IN 1988, WE DUPLICATED THE SUCESS OF THE 1987 BIKE RUN WITH THE SAME CAMPAIGN.

OCTOBER = NOVEMBER 1987...THE Y=96 FM/OPERATION SANTA CLAUS HOP CHEST CHALLENGE.

1987 WAS THE FIRST YEAR OF THIS CO=OPERATIVE EFFORT BETWEEN WYLR AND AREA SCHOOLS TO RAISE FUNDS FOR LOCAL NEEDY FAMILIES. THIS "KIDS HELPING KIDS" PROJECT RAISED \$6136.67 FOR OPERATION SANTA CLAUS. THE OVERALL EVENT WAS PROMOTED HEAVILY FOR SIX WEEKS, AS WELL AS INDIVIDUAL SCHOOL FUNDRAISING EVENTS DURING THE PERIOD. A REMOTE WAS HELD ON THE FINAL COLLECTION DAY.

JANUARY 1983, 1984, 1985, 1986, 1987...WINTER FUN DAY.

WYLR WAS THE SOLE MEDIA OUTLET AND CO=SPONSOR OF THE GLENS FALLS PTA WINTER FUN DAYS DURING THE MID 1980s. THE EVENTS WERE HELD IN CRANDALL PARK IN GLENS FALLS, AND CONSISTED OF SUCH EVENTS AS CROSS COUNTRY SKIING, ICE SKATING, BROOM BALL, YOUTH HOCKEY, HORSEBACK RIDES, HOT AIR BALLOON RIDES, ECT. WYLR WAS INVOLVED IN THE PRE=EVENT PLANNING OF THESE ANNUAL DAYS, AND BROADCAST FROM THE EVENTS.

FEBRUARY 1986...LAKE GEORGE WINTER CARNIVAL.

WYLR, USED IT'S MOBILE BROADCAST FACILITIES TO BROADCAST EVENTS, SCHEDULE CHANGES, AND TRAFFIC INFORMATION FROM THE LAKE GEORGE WINTER CARNIVAL, AND ANNUAL EVENT OF THE LAKE GEORGE CHAMBER OF COMMERCE. ON THE FINAL WEEKEND, WYLR SPONSORED A MASS "POLAR BEAR SWIM" WITH OUR STAFF ACTING AS GUIDES.

FEBRUARY 1987...LAKE GEORGE WINTER CARNIVAL.

WYLR USED IT'S MOBILE BROADCAST FACILITIES TO ASSIST LOCAL AUTHORITIES WITH TRAFFIC AND SCHEDULE UPDATES.

AUGUST 1989...THE SOFTBALL MARATHON FOR EASTER SEALS.

**CERTIFICATE OF SERVICE**

I, LESLIE A. GUILFOYLE, a secretary in the law office of Arent, Fox, Kintner, Plotkin & Kahn do hereby certify that a copy of the foregoing **SUPPLEMENT TO PETITION TO ENLARGE ISSUES** has been sent via U.S. Mail, First-Class postage prepaid this 30th day of March, 1992 to the following:

Administrative Law Judge  
Richard L. Sippel  
Federal Communications Commission  
2000 L Street, N.W., Room 212  
Washington, D.C. 20554

Paulette Laden, Esq.  
Federal Communications Commission  
Hearing Branch, Enforcement Division  
2025 M Street, N.W., Room 7212  
Washington, D.C. 20554

Christopher P. Lynch, President  
Normandy Broadcasting Corp.  
217 Dix Avenue  
Glens Falls, NY 12801

  
Leslie A. Guilfoyle

\* Hand Delivered